*PHILIP MORRIS'S ANSWERS AND OBJECTIONS
TO PLAINTIFFS' INTERROGATORIES*

CASE: CABALLERO

STATE: TX (Duval County)

DATE: 28-AUG-86

QUESTION # 58

NOTE: ***

Q: In respect to each additive used by you in either the cigarette rod or filter of Marlboro brand of cigarettes since 1950, please furnish the following information: (a) State such additive's chemically descriptive and general name, and each chemical compound contained therein. (b) State the purpose for its use. (c) Describe the process of incorporating such additive into the cigarette. (d) Have you identified the combustion or pyrolytic compounds of such additive? If so, identify same. (e) State the name and address of the manufacturer and supplier of such additive.

A: Philip Morris objects to this interrogatory on the grounds that it is unduly burdensome and oppressive, that it seeks information that is irrelevant to any issue in this case, and that it is not reasonably calculated to lead to the discovery of admissible evidence. In addition, Philip Morris objects to this interrogatory on the grounds that it calls for the disclosure of highly confidential and sensitive trade secret information, and that such disclosure would result in irreparable harm and competitive injury to Philip Morris. Subject to and without waiver of the foregoing general and specific objections, Philip Morris will produce, subject to the entry of an appropriate protective order, a list of constituents reported to be present in cigarette smoke. The list includes the constituents of smoke from Marlboro cigarettes for the years Ricardo Caballero smoked that brand. This list will include the pyrolytic products of the tobacco leaf and additives. Philip Morris does not represent that this list includes every constituent of cigarette smoke, for some are in such minute quantities that they cannot be measured by present analytical methods. Cigarettes contain a combination of the following basic types of tobacco: flue-cured, burley, Maryland and Turkish. Additives of tobacco include humectants, casing materials, and flavorants. Humectants are used to keep moisture in the tobacco, casing materials are used to achieve flavor and to improve tobacco processing, while flavorants are used in minute quantities to give each brand its unique taste.

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CASE: CABALLERO

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QUESTION # 59

NOTE: ***

Q: Describe all information about cigarette additives which you have furnished to any U.S. governmental agency or representative.

A: Philip Morris reiterates and incorporates its response to Interrogatory No. 58. In addition, Philip Morris notes the confidentiality provisions of 15 U.S.C. $ 1335a(a), (b)(2)(A), and (b)(2)(C).

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*PHILIP MORRIS'S ANSWERS AND OBJECTIONS
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CASE: CABALLERO

STATE: TX (Duval County)

DATE: 28-AUG-86

QUESTION # 60

NOTE: ***

Q: State the name, address and title of your employee or representative that is most knowledgeable to discuss such cigarette additives, the chemical compounds contained therein, your records kept in respect to such additives, and the preparation of information on cigarette additives either furnished or requested to be furnished by the federal government.

A: Philip Morris reiterates and incorporates its responses to Interrogatory Nos. 58 and 59.

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*PHILIP MORRIS'S ANSWERS AND OBJECTIONS
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CASE: CABALLERO

STATE: TX (Duval County)

DATE: 28-AUG-86

QUESTION # 61

NOTE: ***

Q: Describe the documents in your possession, custody or control which identifies the additives used by you in making cigarettes, the chemical compounds contained in such additives, the pyrolytic compounds thereof, and any toxicity data in respect thereto.

A: Philip Morris reiterates and incorporates its responses to Interrogatory Nos. 58 and 59. In addition, Philip Morris objects that this interrogatory is overly broad because it is not limited to the brand of Philip Morris cigarettes allegedly smoked by Ricardo Caballero or to the times during which Ricardo Caballero smoked those cigarettes. The identity of flavorants and their chemical compounds is highly confidential, proprietary, tradesecret information the disclosure of which would result in irreparable harm and competitive injury to Philip Morris.

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